ENTERPRISE RECOVERY SYSTEMS SITE
MONTHLY PROGRESS REPORT
JANUARY 15, 1994

The following report is submitted in compliance with the Administrative Order on Consent. This report summarizes activities that occurred in the past month but is not intended as an exhaustive account of activities on or related to the Site.

PERIOD COVERED: December 15 - January 15, 1994

I. SIGNIFICANT DEVELOPMENTS DURING PERIOD

A. Actions Performed

Soil removal activities, which began on December 13, 1994, were continued during this reporting period. Approximately 1,691 tons of soil from Areas A, C, and F were removed and shipped to the Chemical Waste Management, Inc. facility in Carlyss, Louisiana. All soil excavation, shipment, and disposal was stopped on December 19, 1994 due to the Land Disposal Restrictions on D018 - D043 waste effective on midnight December 19, 1994. The figures and tables attached with this monthly report present the soil sample locations and the analytical results for the soil removal activities. Figure 1 depicts the areal extent of excavation in each area of the site. A brief description of the site activities in each of the soil removal areas is described in the following sections.

Area A

Area A was excavated to a maximum depth of six (6) feet below land surface (bls) and the total excavation volume was calculated to be approximately 1,250 cubic yards. Soil samples ERS1-S-A18 through ERS1-S-A33 were collected in Area A as confirmation samples. All postexcavation or confirmation sample results in Area A were below the EPA action limits listed in the Administrative Order on Consent (AOC) (Table 1, Figure 2).

Area C

The maximum depth of excavation in Area C was 15 feet bls and the total excavation volume was calculated to be approximately 250 cubic yards. Three confirmation soil samples in this area (C22, C25, and C26) contained volatile organic concentrations above the AOC action limits. Expansion excavation and sampling were performed in the vicinity of sample C22, and the subsequent verification samples in this area (C27, C28, and C29) were below the AOC action limits. Soil removed during the expansion activity

(approx. 80 tons) was stockpiled near Area A and was not transported off site. Toxicity Characteristics Leaching Procedure (TCLP) analysis of a composite sample taken from this pile indicates that it is non-hazardous. After expansion excavation, only two samples exceeded AOC action levels, samples C25 and C26 taken from the east end of the excavation. Excavation was not continued in the areas of samples C25 and C26 due to the time constraints to meet the land disposal restriction date. During excavation activities in Area C, a pipe was encountered approximately 1 to 1.5 feet below land surface. Verification soil sample results are presented in Table 2 and sample locations are depicted on Figure 3.

Area F

The concrete pad and berm wall in Area F were removed using the excavator and stockpiled approximately 50 feet north of this area. The concrete stockpile has not been removed from the site. TCLP analysis of the concrete indicates that it is non-hazardous. Soil removal was initiated in Area F; however, due to the land disposal time constraint only three truck loads of soil were removed from this area (approximately 60 tons, Figure 1). Several soil samples were collected in and around Area F to document the volatile organic compound concentrations in this area. Table 3 and Figure 4 present the sample locations and results.

Residential Potable Water Status

WCC has confirmed that the three residences (Cook, Crum, and Watkins) which were supplied with bottled water by the ERS Site Group have all been connected to the municipal water supply. Watkins and Cook have refused to plug and abandon their potable groundwater wells.

B. Problems Encountered

Weather conditions complicated soil removal activities, particularly in Area F. Surface water (precipitation) has accumulated in Areas A and C. Limited availability of transport trucks also slowed activities prior to the land disposal restriction deadline on December 19, 1994.

II. ANALYTICAL DATA RECEIVED DURING PERIOD

Analytical data for the soil samples collected in Areas A, C, and F are presented on Tables 1 through 3.

III. DEVELOPMENTS ANTICIPATED DURING NEXT PERIOD

A. Schedule of Actions to be Performed

Based on the data collected during the soil removal activities several options are under consideration for assuring completion of the soil removal activities under the AOC. A specific schedule for such actions will be developed after a procedure is selected.

B. Anticipated Problems

The land disposal restrictions promulgated in the September 19, 1994 Federal Register effective on December 19, 1994 may adversely affect the land disposal option for additional excavated soil, if any, that is found to be hazardous waste.

C. Planned Resolutions of Past or Anticipated Problems

The workplan may be amended to incorporate resolutions to the submerged conditions in Area C and to increase the effectiveness of confirmatory sampling. The ERS Project Coordinator will prepare a draft amendment to the Soil Removal Workplan for EPA review and comment to expedite the soil removal activities at the site.

TABLE 1

ENTERPRISE RECOVERY SYSTEMS
VERIFICATION SAMPLE RESULTS[1]

AREA A

Sample I.D.	Date	Acetone	Ethylbenzene	MEK[2]	Toluene	Trichloroethylene[3]	1,1,1-Trichloroethane	Xylenes	OVA[4]
ERS1-S-A18-C[5]	16-Dec-94	ND[6]	ND	ND	ND	0.27J[7]	ND	ND	80
ERS1-S-A19-G[8]	16-Dec-94	ND	ND	ND	ND	ND	ND	ND	375
ERS1-S-A20-G	16-Dec-94	ND	ND	ND	ND	ND	ND	ND	110
ERS1-S-A21-G	16-Dec-94	ND	ND	ND	ND	0.65	ND	ND	120
ERS1-S-A22-C	16-Dec-94	ND	ND	ND	ND	ND	ND	ND	120
ERS1-S-A23-G	18-Dec-94	ND	ND	ND	ND	ND	ND	ND	10
ERS1-S-A24-G	18-Dec-94	ND	ND	ND	ND	ND	ND	ND	40
ERS1-S-A25-G	18-Dec-94	ND	ND	ND	ND	ND	ND	ND	100
ERS1-S-A26-G	18-Dec-94	ND	ND	ND	ND	ND	ND	ND	200
ERS1-S-A27-C	18-Dec-94	ND	ND	ND	ND	ND	ND	ND	>1000
ERS1-S-A28-C	18-Dec-94	ND	194	ND	398	43.7	5.99	497	80
ERS1-S-A29-C	18-Dec-94	ND	ND	ND	ND	ND	ND	0.84	15
ERS1-S-A30-C	18-Dec-94	ND	ND	ND	ND	ND	ND	ND	5
ERS1-S-A31-C	18-Dec-94	ND	88.1	ND	14.6	4.65J	ND	58.4	>1000
ERS1-S-A32-C	18-Dec-94	ND	ND	ND	ND	ND	0.26J	ND	1
ERS1-S-A33-C	18-Dec-94	ND	ND	ND	ND	ND	ND	ND	2
EPA CLEAN-UP STANDARD		500	500	500	500	50	250	500	>500[9]

1. Results are reported as parts per million (ppm).
2. MEK = Methyl Ethyl Ketone.
3. Trichloroethylene (Trichloroethene).
4. OVA = Organic Vapor Analyzer. A flame ionization detector (F.I.D.) used to detect organic vapors and measured in parts per million (ppm).
5. C = Composite Sample.
6. ND = Not Detected.
7. J = Estimated Value. Presence of the compound was confirmed; less than the quantitation limit but greater than zero.
8. G = Grab Sample (discrete sample).
9. OVA readings greater than 500 constituted expansion of the excavated area.

TABLE 2

ENTERPRISE RECOVERY SYSTEMS
VERIFICATION SAMPLE RESULTS[1]

AREA C

Sample I.D.	Date	Acetone	Ethylbenzene	MEK[2]	Toluene	Trichloroethylene[3]	1,1,1-Trichloroethane	Xylenes	OVA[4]
ERS1-S-C20-SWC[5]	15-Dec-94	ND[6]	0.009	ND	0.09	0.61	0.08	0.04	120
ERS1-S-C21-G[7]	15-Dec-94	ND	0.002J[8]	ND	0.01	3.86	0.16	0.003	400
ERS1-S-C22-SWC	15-Dec-94	ND	ND	ND	39.2	2,030	406	28.8	450
ERS1-S-C23-G	15-Dec-94	0.24	0.004J	0.05	0.03	0.78E[9]	0.04	0.03	>1000
ERS1-S-C24-G	15-Dec-94	ND	ND	ND	0.01	8.21	2.27	0.003J	>1000
ERS1-S-C25-SWC	15-Dec-94	ND	0.006	ND	0.03	98.9E	15.8	0.02	>1000
ERS1-S-C26-G	15-Dec-94	1.18E	0.66E	0.44	3.17	273E	9.9	3.04	>1000
ERS1-S-C27-G	20-Dec-94	ND	ND	ND	ND	ND	ND	ND	78
ERS1-S-C28-G	20-Dec-94	ND	ND	ND	ND	ND	ND	ND	20
ERS1-S-C29-G	20-Dec-94	ND	ND	ND	ND	0.10J	ND	ND	52
EPA CLEAN-UP STANDARD		500	500	500	500	59	250	500	>500[10]

1. Results are reported as parts per million (ppm).
2. MEK = Methyl Ethyl Ketone.
3. Trichloroethylene (Trichloroethene).
4. OVA = Organic Vapor Analyzer. A flame ionization detector (F.I.D.) used to detect organic vapors and measured in parts per million (ppm).
5. SWC = Sidewall Composite. Composite sample from sidewalls of excavation.
6. ND = Not Detected.
7. G = Grab sample (discrete sample).
8. J = Estimated Value. Presence of the compound was confirmed; less than the quantitation limit but greater than zero.
9. E = Concentration exceeds the established calibration limit.
10. OVA readings greater than 500 ppm constituted expansion of excavated area.

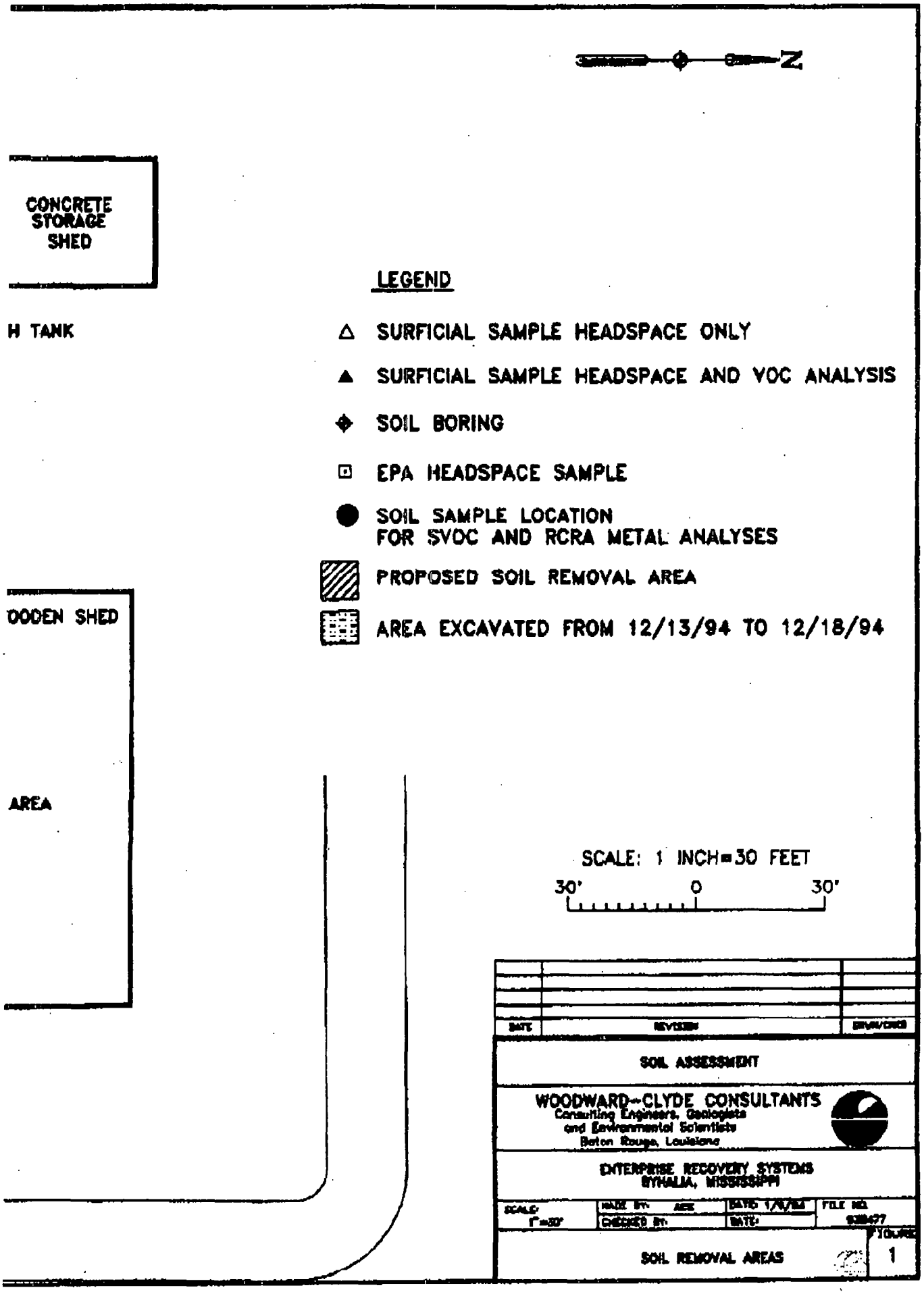
TABLE 3

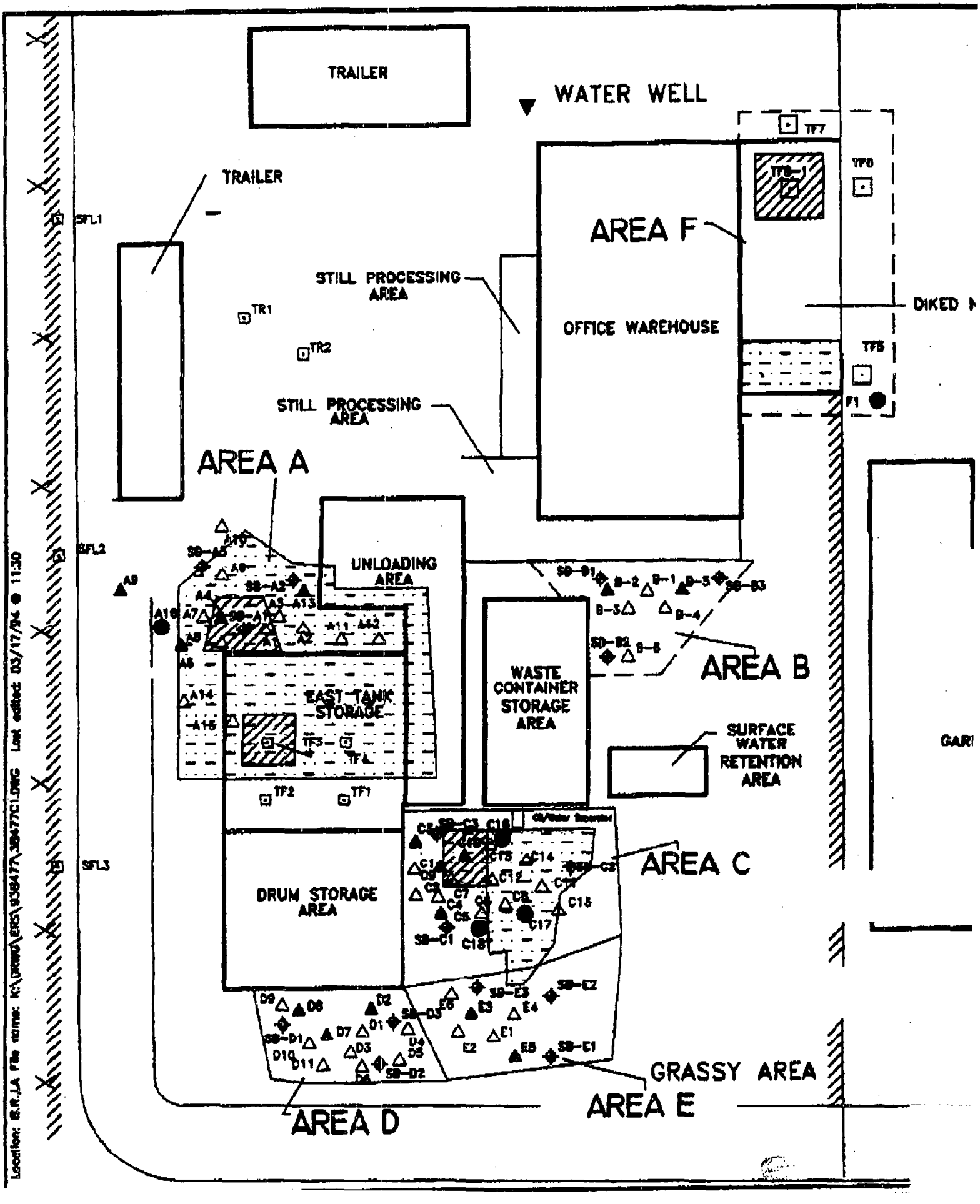
ENTERPRISE RECOVERY SYSTEMS
VERIFICATION SAMPLE RESULTS[1]

AREA F

Sample I.D.	Date	Acetone	Ethylbenzene	MEK[2]	Toluene	Trichloroethylene[3]	1,1,1-Trichloroethane	Xylenes	OVA[4]
ERS1-S-TF10-G[5]	18-Dec-94	ND[6]	19.2	2.55J[7]	12.5	0.87	16.6	23.3	>1000
ERS1-S-TF11-G	18-Dec-94	ND	1.05	ND	1.58	0.79	24.3	7.15	>1000
ERS1-S-TF12-G	19-Dec-94	ND	ND	ND	ND	5.04	27.7	ND	>1000
ERS1-S-TF13-G	19-Dec-94	ND	ND	ND	1.44J	36.4	296E[8]	ND	>1000
ERS1-S-TF14-G	19-Dec-94	ND	ND	ND	ND	0.80	3.51	ND	>1000
ERS1-S-TF15-G	19-Dec-94	ND	ND	1.49J	0.18J	3.71	26.2E	0.15J	>1000
ERS1-S-TF16-G	19-Dec-94	ND	ND	ND	ND	ND	ND	ND	>1000
ERS1-S-TF17-G	19-Dec-94	ND	ND	ND	ND	0.21J	ND	ND	600
ERS1-S-TF18-G	19-Dec-94	ND	ND	ND	ND	0.14J	0.78	ND	710
ERS1-S-TF19-G	19-Dec-94	ND	ND	ND	ND	ND	0.24J	ND	6.5
ERS1-S-TF20-G	19-Dec-94	ND	ND	ND	ND	0.31J	1.76	ND	20
ERS1-S-TF21-G	19-Dec-94	ND	ND	ND	ND	0.51J	1.32	ND	>1000
ERS1-S-TF22-G	19-Dec-94	ND	ND	ND	ND	0.50J	0.77	ND	780
EPA CLEAN-UP STANDARD		500	500	500	500	50	250	500	>500[9]

1. Results are reported as parts per million (ppm).
2. MEK = Methyl Ethyl Ketone.
3. Trichloroethylene (Trichloroethene).
4. OVA = Organic Vapor Analyzer. A flame ionization detector (F.I.D.) used to detect organic vapors and measured in parts per million (ppm).
5. G = Grab Sample (discrete sample).
6. ND = Not Detected.
7. J = Estimated Value. Presence of the compound was confirmed; less than the quantitation limit but greater than zero.
8. E = Concentration exceeds the established calibration limit.
9. OVA readings greater than 500 ppm constituted expansion of the excavated area.


Z
CONCRETE STORAGE SHED
H TANK
LEGEND
△ SURFICIAL SAMPLE HEADSPACE ONLY
▲ SURFICIAL SAMPLE HEADSPACE AND VOC ANALYSIS
SOIL BORING
EPA HEADSPACE SAMPLE
SOIL SAMPLE LOCATION FOR SVOC AND RCRA METAL ANALYSES
PROPOSED SOIL REMOVAL AREA
AREA EXCAVATED FROM 12/13/94 TO 12/18/94
OODEN SHED
AREA
SCALE: 1 INCH = 30 FEET
30' 0 30'
DATE
REVISION
SOIL ASSESSMENT
WOODWARD-CLYDE CONSULTANTS
Consulting Engineers, Geologists and Environmental Scientists
Baton Rouge, Louisiana
ENTERPRISE RECOVERY SYSTEMS
SCALE: 1"=30'
DRAWN BY: AEE
DATE: 1/6/95
FILE NO.
CHECKED BY:
DATE:
SOIL REMOVAL AREAS
FIGURE 1


TRAILER
WATER WELL
TRAILER
AREA F
STILL PROCESSING AREA
OFFICE WAREHOUSE
DIKED
TR1
TR2
TF7
TF6
TF5
F1
STILL PROCESSING AREA
AREA A
UNLOADING AREA
EAST TANK STORAGE
WASTE CONTAINER STORAGE AREA
AREA B
SURFACE WATER RETENTION AREA
AREA C
DRUM STORAGE AREA
GRASSY AREA
AREA D
AREA E
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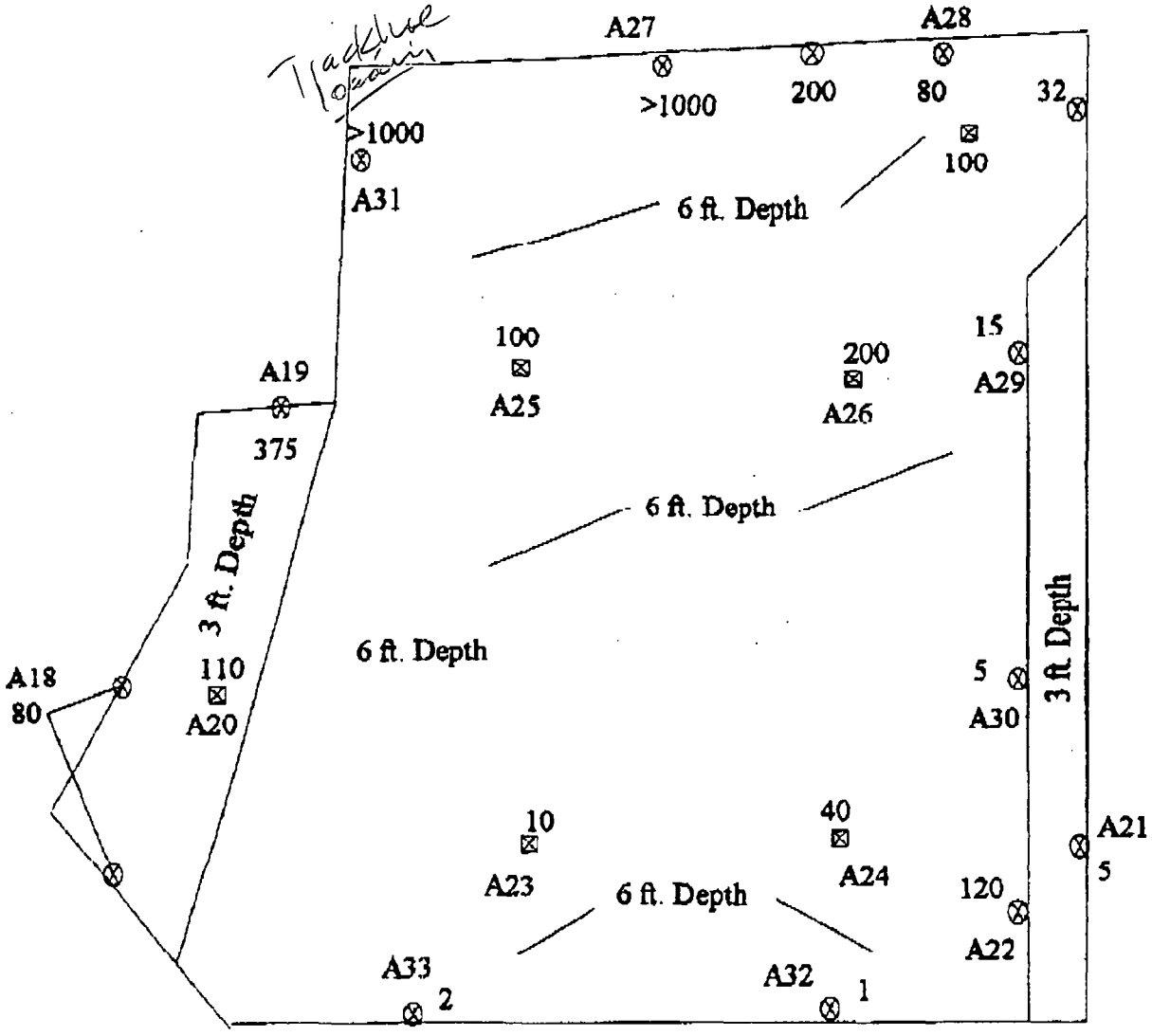
SFL2
SFL3
TF1
TF2
TF3
TF4

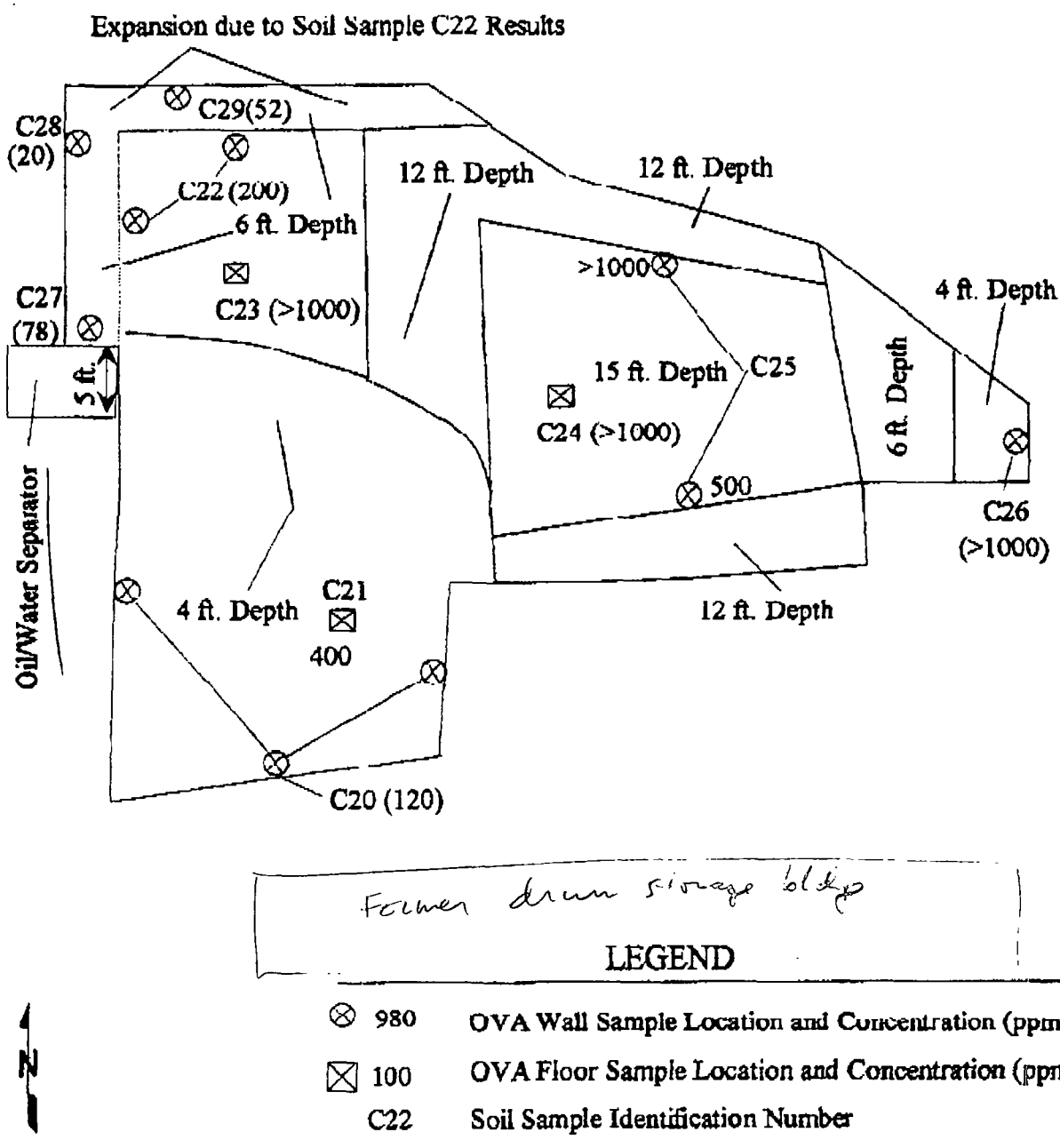


LEGEND

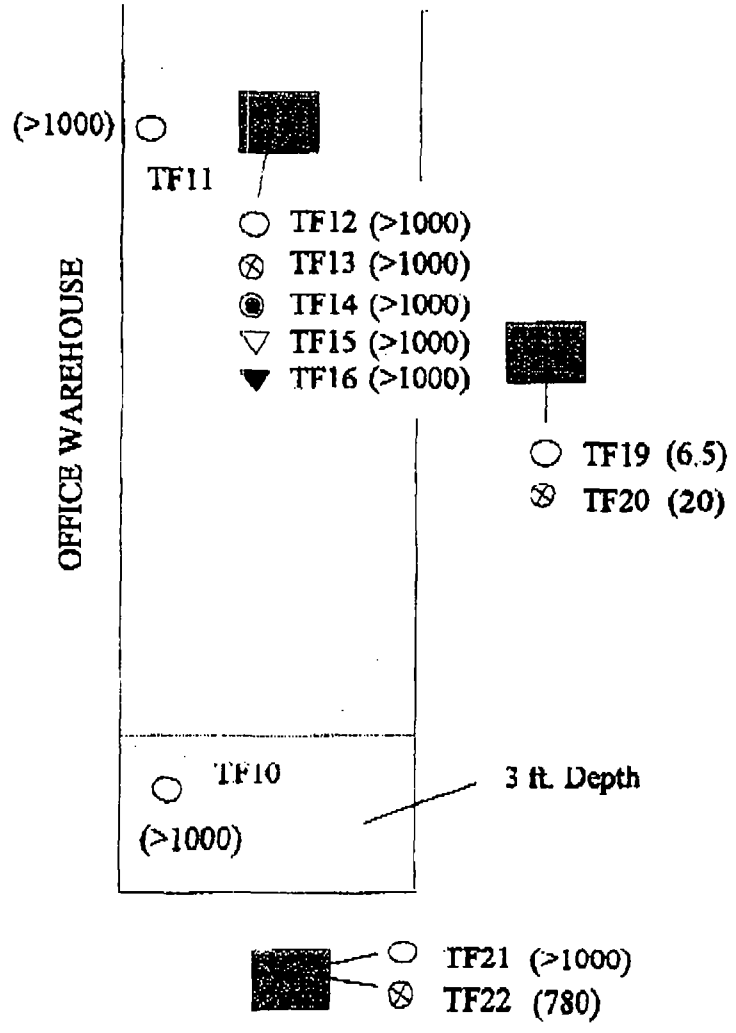
⊗ 980	OVA Wall Sample Location and Concentration (ppm)
⊠ 100	OVA Floor Sample Location and Concentration (ppm)
A23	Soil Sample Identification Number

N

AREA A OVA READINGS AND SOIL VERIFICATION SAMPLE LOCATIONS	WOODWARD-CLYDE CONSULTANTS CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS		
	DR. BY: ACE	SCALE: 1" = 15'	PROJ. NO: 93B477
	CHK. BY:	DATE: 1/7/95	FIG. NO: 2



AREA C OVA READINGS AND SOIL VERIFICATION SAMPLE LOCATIONS	WOODWARD-CLYDE CONSULTANTS CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS		
	DR. BY: ACE	SCALE: 1" = 7'	PROJ. NO: 93B477
	CHK. BY:	DATE: 1/7/95	FIG. NO: 3



LEGEND

- TF12 (>1000) 3 Foot Sample Depth, Sample I.D., OVA Reading
- TF13 (>1000) 6 Foot Sample Depth, Sample I.D., OVA Reading
- TF14 (>1000) 9 Foot Sample Depth, Sample I.D., OVA Reading
- TF15 (>1000) 12 Foot Sample Depth, Sample I.D., OVA Reading
- TF16 (>1000) 15 Foot Sample Depth, Sample I.D., OVA Reading

AREA F OVA READINGS AND SOIL SAMPLE LOCATIONS	WOODWARD-CLYDE CONSULTANTS CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS		
	DR. BY: ACE	SCALE: 1" = 8'	PROJ. NO: 93B477
	CHK. BY:	DATE: 1/7/95	FIG. NO: 4